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January 29, 2020

Maher Budeir
RCRA Corrective Action Section
U.S. EPA – Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Data Gap Investigation Work Plan
International Paper Company
Wood Treating Site, EPA ID # MSD 980 600 084
Wiggins, Mississippi

Dear Mr. Budeir:

International Paper Company submits herein a Data Gap Investigation Work Plan (Work Plan) that includes the elements agreed to in a meeting with EPA, MDEQ, IP and EarthCon representatives during a site visit on December 10, 2019. IP is prepared to begin implementing the Work Plan upon receipt of your approval.

Please do not hesitate to call me at (901) 419-7725 if you need any additional information or have any questions or comments.

Sincerely,



Emily W. Lee, P.G.

Attachments:

cc: Noman Ahsanuzzaman, EPA Region 4
Steve Ginski, IP
Trudy D. Fisher, Butler Snow
Krista Caron, MDEQ
Robert Huckaby, MDEQ
Norman Kennel, EarthCon
Doug Seely, EarthCon

DATA GAP INVESTIGATION WORK PLAN

**INTERNATIONAL PAPER COMPANY
CLOSED FORMER WOOD TREATING SITE UNITS
WIGGINS, MS 39577
MSD 980 600 084**

PREPARED FOR:

**INTERNATIONAL PAPER COMPANY
6400 POPLAR AVENUE
MEMPHIS, TN 38197-0001**

PREPARED BY:

**EARTHCON CONSULTANTS, INC.
1880 WEST OAK PARKWAY
BUILDING 100, SUITE 106
MARIETTA, GA 30062**

PROJECT NO. 02.20000006

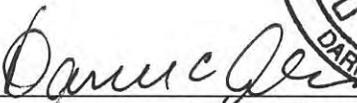
JANUARY 29, 2020

REGISTERED PROFESSIONAL GEOLOGIST STATEMENT

**DATA GAP INVESTIGATION WORK PLAN
INTERNATIONAL PAPER
CLOSED FORMER WOOD TREATING SITE UNITS
WIGGINS, MS
HAZARDOUS WASTE MANAGEMENT FACILITY MSD 980 600 084**

I have reviewed this document in sufficient depth to accept full responsibility for its contents related to the geologic discussion/data/information contained herein.




Darrell C. Adkins, RPG #0709
EarthCon Consultants, Inc.

January 29, 2020
Date

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Appendix B	Photographs
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1.0 INTRODUCTION

International Paper Company (IP) is conducting corrective action and groundwater monitoring at the Closed Former Wood Treating Site Units in Wiggins, Mississippi (Wiggins facility) according to the State of Mississippi Hazardous Waste Management Permit HW-980-600-084 that was issued on May 4, 2010 and the HSWA portion of the permit that became effective January 4, 1993.

In a meeting held on December 10, 2019, attended by US Environmental Protection Agency (EPA), Mississippi Department of Environmental Quality (MDEQ), IP and EarthCon Consultants, Inc. (EarthCon) personnel, it was agreed the IP would prepare a Data Gap Investigation Work Plan (Work Plan) for EPA review to include the elements summarized in the following meeting summary:

- *Installation of a “well cluster” in the area between wells WC-40 and WC-44 (actual location to be based upon a review of the potentiometric surface data collected on December 9, 2019)*
 - *One well is to be screened similarly to WC-40 (~135-145’ msl).*
 - *The second, deeper well will be screened at the bottom of the Citronelle/top of Pascagoula formations (~115-125’ msl).*
 - *The wells will be purged and sampled per methods used for other routine site well sampling.*
- *The following wells will be redeveloped, purged, and sampled:*
 - *WC-43*
 - *WC-08A*
 - *WCP-8*
 - *WP-01*
 - *WP-02*
- *Wells with greater than 10’ of well screen (i.e. WC-08A, WCP-8 and WP-02) will utilize a “packer” to isolate the bottom 10’ of the screen length during sampling.*

The discussion during the meeting included EPA’s concern that elevated concentrations of dissolved wood treating chemical constituents or dense non-aqueous phase liquids (DNAPL) may exist hydraulically downgradient from the closed units at the bottom of the Citronelle/top of the Pascagoula formations. The top of the Pascagoula formation is an aquitard, consisting of clay; therefore, DNAPL, if present may collect in this zone.

EPA, MDEQ, IP and EarthCon representatives also conducted a site visit on December 10, 2019. During the site visit, three shallow wells were observed inside the closed treatment impoundment area (see attached example photograph in Appendix B). The wells were examined during the site visit and were found to be approximately 40 feet deep. IP searched available records regarding well installation/construction, functionality and/or intended use of the wells and was unable to locate any information regarding these three wells.

Included in this Work Plan are a site location map (**Figure 1**), a site map showing features at the Wiggins facility and existing monitoring well locations (**Figure 2**), and potentiometric surface maps for the Citronelle and Pascagoula formation wells based on data collected in December 2019

(**Figures 3 and 4**). A summary of monitoring well construction data is also attached for reference (**Table 1**). Drilling and well construction logs for WC-08A, WC-40, WC-43, WC-44, WCP-8, WP-1 and WP-2 are included in **Appendix A**.

2.0 MONITORING WELL INSTALLATION AND ABANDONMENT

A monitoring well cluster, consisting of two wells designated WC-56 and WC-57 will be installed in an area between monitoring wells WC-40 and WC-44 as shown on **Figure 5**. The location of the well cluster is hydraulically downgradient of WC-40 based on December 2019 potentiometric surface data (**Figure 3**). The purpose of the two new monitoring wells is to assess potential concentrations of creosote constituents and pentachlorophenol (PCP) in the Citronelle aquifer downgradient from monitoring well WC-40:

- At a similar screen depth as WC-40; and
- At a greater depth; i.e. the at the bottom of the Citronelle/top of Pascagoula formation.

During the same mobilization to install the monitoring well cluster, the three existing monitoring wells identified inside the closed treatment impoundment area will be abandoned.

Monitoring well installation and abandonment will be conducted by a Mississippi-licensed Water Well Contractor and in accordance with applicable guidance included in EPA Region 4 SEDGUID-1-1-R0, Design and Installation of Monitoring Wells (https://www.epa.gov/sites/production/files/2014-03/documents/appendix_m_monitor_well_installation.pdf) and MDEQ Administrative Procedures Act Rules Title 11, Part 7, Surface Water and Groundwater Use and Protection, Licensing of Water Well Contractors and Dam Safety Regulations (<https://www.mdeq.ms.gov/wp-content/uploads/2017/10/WellDrillerRegs..pdf>).

2.1 Utility Locating

Prior to drilling the boreholes for WC-56 and WC-57, Mississippi 811 will be contacted to identify the locations of public underground utilities in the vicinity of the work. In addition, facility utility information will be requested from Baldwin Pole Mississippi, and a private utility locating service will be contacted to identify potential conflicts with private underground utilities at the proposed boring locations.

2.2 Soil Borings

The boreholes will be drilled using the rotary sonic drilling method. The drilling will involve advancing 10-foot long sections of 4.5-inch outer diameter (OD) and 6.5-inch OD sonic rods. The 4.5-inch OD rod will be advanced 10 feet, then the 6.5-inch OD rod will be advanced over the smaller rod to the same depth. The 4.5-inch rod will then be retrieved to collect the soil sample. This process will be repeated at 10-foot intervals until the desired depth is reached.

The initial borehole, designated WC-56 will be advanced to the contact of the Citronelle and Pascagoula formations (the top of the latter formation is referred to as the Pascagoula clay), this contact has been identified at the Wiggins site as being a yellow to bluish-gray stiff silty clay. The

second borehole, designated WC-57 will be placed within approximately ten feet from WC-56 and to a depth of approximately 20 feet above the top of the Pascagoula clay. Soil samples will be retrieved from each borehole at 10-foot intervals and the samples will be placed in a polyethylene sleeve. The samples will be observed, classified and logged by the on-site geologist. The larger-diameter sonic rods remain in the borehole and act as an outer casing until the monitoring well is constructed.

2.3 Monitoring Well Installation

After reaching the terminal depth of each borehole, a groundwater monitoring well will be constructed in each borehole as the larger-diameter sonic rods are retrieved. The monitoring wells will be constructed of rigid poly-vinyl chloride (PVC), each with a 10-foot section of screen with 0.010-inch slots. A 20-40 sand filter pack will be installed around the screened section to approximately two feet above the top of the screen, followed by approximately two feet of bentonite pellets. The remainder of the annular space surrounding the riser will be filled with grout after the bentonite is hydrated. Each well will be completed at the surface with a load-rated locking monitoring well vault. After a minimum of 24 hours following well installation and surface completion, each well will be developed to remove residual materials remaining in the wells and to attempt to re-establish the natural hydraulic flow conditions of the formation around the wells. Well development methods used will include pumping with a submersible pump and/or an air-lift pump. The wells will be developed until the column of water in the well is reasonably free of visible sediment.

2.3 Monitoring Well Abandonment

The three monitoring wells observed inside the closed treatment impoundment area will be abandoned in a manner consistent with EPA and MDEQ guidance.

2.4 Surveying

The location and casing elevation for each newly installed well will be surveyed by a Mississippi-registered surveyor, and the information will be added to the site's well network database.

3.0 MONITORING WELL REDEVELOPMENT

Monitoring wells WC-43, WC-08A, WCP-8, WP-1, and WP-2 will be redeveloped prior to sampling. Prior to redevelopment, the depth of each well will be measured and compared to the constructed depth to identify the effort and methods needed for redevelopment. The wells will be redeveloped using a submersible and/or air-lift pump until sediment accumulated in the bottom of each well, if any, has been removed and the recovered water is reasonably free of sediment.

4.0 GROUND WATER SAMPLING

Groundwater samples will be collected during the Spring 2020 semi-annual monitoring event. Prior to sampling, an oil/water interface probe will be used to measure the depth to water, the

potential presence of separate-phase product, and the total depth of each well. Samples will be collected from:

- The permit required site wells,
- The newly installed monitoring wells (WC-56 and WC-57), and
- Wells WC-43, WC-08A, WCP-8, WP01, and WP-2.

Each well will be purged and sampled using the low-flow method described in the EPA Region 4, Science and Ecosystem Support Division, Operating Procedure SESDPROC-301-R4, Groundwater Sampling (<https://www.epa.gov/sites/production/files/2015-06/documents/Groundwater-Sampling.pdf>). Field parameter data including pH, specific conductance, temperature, dissolved oxygen, turbidity, and oxidation-reduction potential will be measured during purging and samples will be collected after measurements have stabilized. The data collected during sampling will be recorded Groundwater Sampling Record. A blank Groundwater Sampling Record form is included in **Appendix C**.

A packer will be installed in monitoring wells with screen lengths greater than 10 feet (i.e. WC-08A, WCP-8 and WP-2) prior to purging/sampling activities in an attempt to isolate the bottom of the screened interval during sampling. An inflatable packer will be installed and inflated approximately 10 feet above the bottom of the screened interval. The depth to water in the casing above the packer will be measured during purging and sampling and the purge/sampling rate will be adjusted to minimize drawdown.

4.1 Laboratory Analyses

The samples will be submitted to Pace analytical laboratory in Mt. Juliet, Tennessee for analyses for the Ground Water Protection Standards (GWPS) constituents listed in the MDEQ permit (**Table 2**) using EPA Methods 8260B and 8270C. The laboratory results will be reviewed and validated, and the validated results will be compared to the GWPS.

4.2 Quality Assurance and Quality Control

Quality control (QC) samples will consist of one equipment blank, one duplicate sample, a trip blank for each cooler (VOCs only), and a matrix spike/matrix spike duplicate.

5.0 INVESTIGATIVE-DERIVED WASTE MANAGEMENT

Investigative Derived Waste (IDW) generated during field activities will be addressed in accordance with USEPA Operating Procedure SESDPROC-202-R3 “Management of Investigative Derived Waste” (<https://www.epa.gov/sites/production/files/2015-06/documents/Management-of-IDW.pdf>). IDW (i.e. drill cuttings, development/purge water, etc.) will be containerized, and the ultimate disposition of the IDW will be determined once analytical results are received utilizing USEPA Operating Procedure SESDPROC-202-R3.

6.0 REPORT PREPARATION

Upon completion of the fieldwork, receipt of laboratory analyses and data validation, a report will be prepared that will include the following:

- A narrative summary of fieldwork and findings;
- Soil boring logs and well completion diagrams for each newly installed well;
- Well abandonment documentation;
- Groundwater sampling forms;
- Summary tables of field and laboratory data, including water levels and NAPL measurements;
- A site figure showing the locations of monitoring wells, including the newly installed wells; and,
- Laboratory analytical and data validation reports.

TABLES

Table 1. Monitoring Well Completion Data

Well Number	Coordinates ⁸		Well Installation		Elevation ¹		Screen Top		Screen Bottom		Screen Length (feet)
	East	North	By	Date	Ground	TOC ²	Depth	Elevation	Depth	Elevation	
MONITORING WELLS											
WC-05	51798.58	9782.7	HET ³	Sep-81	204.71	204.73	15	187.9	25	177.9	10
WC-07 ⁷	51871	9216	LAW ⁴	May-83	239.1	241.2	41	198.1	60.2	178.9	19.2
WC-08	51919.91	9570.82	LAW	May-83	223.52	224.86	28.2	195.5	47	176.7	18.8
WC-11	51894.09	9820.14	LAW	May-83	201.18	202.58	6.2	195	25	176.2	18.8
WC-13	50577.54	9593.83	LAW	Apr-83	239.39	241.17	41	198.5	60.2	179.3	19.2
WC-14	51690.28	9316.19	LAW	Aug-83	236.04	238.04	40.9	195.2	60.3	175.8	19.4
WC-19	50715.63	9290.66	JLGA ⁵	Jul-84	244.51	247.27	55	189.5	65	179.5	10
WC-21 ⁷	51734	9044	JLGA	Jun-87	240.8	243.3	49.2	191.7	69.3	171.6	20.1
WC-22	51236.24	9373.88	JLGA	Dec-85	243.13	244.68	48.9	194.4	63.9	179.4	15
WC-23	51247.08	9181.39	JLGA	Dec-85	246.33	248.1	48.7	197.7	63.7	182.7	15
WC-24	51349.14	9025.66	JLGA	Dec-85	247.08	249.64	50	197	65	182	15
WC-25	51584.65	9031.57	JLGA	Dec-85	242.85	245.75	49.7	193.1	64.7	178.1	15
WC-28	51884.38	9018.1	JLGA	Jun-87	236.23	238.22	50.9	185.6	70.9	165.6	20
WC-29	51811.17	9105.67	JLGA	Jun-87	240.95	241.59	46.3	192.7	66.3	172.7	20
WC-30	51759.47	9172.77	JLGA	Jun-87	242.02	243.27	42.8	198.1	62.8	178.1	20
WC-31	51445.5	9403.94	JLGA	Jun-87	236.08	237.7	35.7	200.7	55.8	180.6	20.1
WC-33	50712.96	9342.4	JLGA	Jun-87	244.6	247.03	41.1	203.4	61.1	183.4	20
WC-34	50599	9349.59	JLGA	Jun-87	242.7	243.83	49.6	191.7	69.6	171.7	20
WC-35	50542.87	9435.24	JLGA	Jun-87	241.44	242.69	50.2	189	70.2	169	20
WC-36	9924	50746	JLGA	Jun-87	232.5	234.38	40	194.38	60	174.38	20
WC-39	51803.03	8720.38	WCC ⁶	Sep-91	239.94	242.1	95	144.52	105	134.52	10
WC-40	51277.55	8698.61	WCC	Sep-91	248.42	250.71	95	153.42	105	143.42	10
WC-41	51593.77	8100.28	WCC	Feb-93	248.92	251.43	122.5	126.56	132.5	116.56	10
WC-42	51939.85	7489.57	WCC	Feb-93	249.04	252.21	117	132.36	127	122.36	10
WC-43	51595.42	9320.68	WCC	Feb-93	235.81	238.33	106	129.23	116	119.23	10
WC-44	50976.95	8081.22	Premier	Jun-05	240.18	240.03	44	196.13	64	176.3	20
WC-45	51262.94	8722.78	Premier	Oct-06	248.48	248.15	98	150.48	108	141.48	10
WC-46	51285.86	8679.64	Premier	Oct-06	248.30	247.93	65	183.3	75	173.3	10
WC-47	51289.65	8669.40	Premier	Oct-06	248.21	247.77	95	153.21	105	143.21	10
WC-48	51906.05	8265.80	Premier	Oct-06	241.32	240.79	55	186.32	65	176.32	10
PILOT STIDY WELLS											
WC-48i	486188.63	892433.67	EarthCon	Oct-11	214.84	217.84	15	202.84	50	187.84	15
WC-49s	486190.91	892428.82	EarthCon	Oct-11	214.41	217.71	15	202.71	30	187.71	15

Table 1. Monitoring Well Completion Data

Well Number	Coordinates ⁸		Well Installation		Elevation ¹		Screen Top		Screen Bottom		Screen Length (feet)
	East	North	By	Date	Ground	TOC ²	Depth	Elevation	Depth	Elevation	
WC-49i	486188.63	892433.67	EarthCon	Oct-11	214.84	217.84	35	182.84	50	167.84	15
WC-50i	486156.64	892458.70	EarthCon	Oct-11	218.4	221.41	10	211.41	50	171.41	10
WC-50s	486161.68	892454.71	EarthCon	Oct-11	217.6	221.10	20	201.1	35	186.1	15
WC-51i	486128.34	892490.22	EarthCon	Oct-11	220.79	223.64	45	178.64	55	168.64	10
WC-51s	486132.99	892485.81	EarthCon	Oct-11	219.17	222.97	25	197.97	40	182.97	15
WC-52i	486063.92	892338.52	EarthCon	Oct-11	221.41	224.76	55	169.76	65	159.76	10
WC-52s	486066.83	892332.92	EarthCon	Oct-11	221.43	224.93	30	194.93	40	184.93	10
WC-53i	4865051.28	892406.53	EarthCon	Oct-11	225.21	228.21	55	173.21	65	163.21	10
WC-53s	486057.38	892403.78	EarthCon	Oct-11	224.81	228.01	35	193.01	50	178.01	15
WC-54s	485908.37	892197.81	EarthCon	Oct-11	228.92	232.52	35	197.52	50	182.52	15
WC-55i	485902.31	892361.63	EarthCon	Oct-11	230.8	234.23	55	179.23	65	169.23	10
WC-55s	485908.45	892354.82	EarthCon	Oct-11	230.84	234.09	35	199.09	50	180.84	15
RECOVERY WELLS											
WCP-1	51852.92	9753.23	JLGA	Nov-88	205.47	208.35	15.5	189.7	40.5	164.7	25
WCP-2	51721.74	9566.54	JLGA	Nov-88	223.14	225.67	32.8	190	57.9	165	25.1
WCP-3	51602.79	9410.99	JLGA	Nov-88	229.59	231.85	45.7	183.3	70.7	158.3	25
WCP-4	51388.16	9340.05	JLGA	Nov-88	239.43	242.26	50	189.1	75	164.1	25
WCP-5	51786.76	9403.72	JLGA	Nov-88	230.57	233.36	35	195.3	60	170.3	25
WCP-6	51551.46	9267.35	JLGA	Nov-88	238.25	241.38	45.6	193.1	70.6	168.1	25
WCP-7	51748.16	9105.31	JLGA	Nov-88	240.65	244.21	52	188.7	77	163.7	25
WCP-8	51485.87	9091.15	JLGA	Nov-88	244.09	247.24	56.5	187.5	81.5	162.5	25
WCP-9	50669.18	9325.18	JLGA	Nov-88	243.32	245.62	57	186.4	82	161.4	25
PASCAGOULA WELLS											
WP-1	N/A	N/A	LAW	May-83	205.79	207.52	135	N/A	144.4	N/A	9.4
WP-2	N/A	N/A	JLGA	Aug-84	238.6	239.39	169	N/A	189	N/A	20
WP-3	N/A	N/A	JLGA	Aug-84	239.54	242.59	159	N/A	169	N/A	10
WP-4P	N/A	N/A	JLGA	Dec-85	205.4	207.55	167	N/A	217	N/A	50
RECHARGE WELLS											
WCR-1 ⁷	51561	9844	JLGA	Nov-88	219.9	222.89	30	189.9	45	174.9	15
WCR-2 ⁷	51475	9795	JLGA	Nov-88	221.2	224.19	30	191.2	45	176.2	15
WCR-3 ⁷	51386	9751	JLGA	Nov-88	224.2	226.36	35	189.2	50	174.2	15
WCR-4 ⁷	51292	9705	JLGA	Nov-88	227.3	230.22	35	192.3	50	177.3	15
WCR-5 ⁷	51603	9864	JLGA	Apr-89	218.2	221.02	18.5	199.7	110.5	107.7	92
WCR-6 ⁷	51518	9821	JLGA	Apr-89	220.8	223.16	20	200.8	110.5	110.3	90
WCR-7 ⁷	51443	9785	JLGA	Apr-89	222.8	225.16	16.5	206.3	108	114.8	91.5

Table 1. Monitoring Well Completion Data

Well Number	Coordinates ⁸		Well Installation		Elevation ¹		Screen Top		Screen Bottom		Screen Length (feet)
	East	North	By	Date	Ground	TOC ²	Depth	Elevation	Depth	Elevation	
WCR-8 ⁷	51327	9719	JLGA	Apr-89	226	228.83	25	201	105	121	80

Notes:

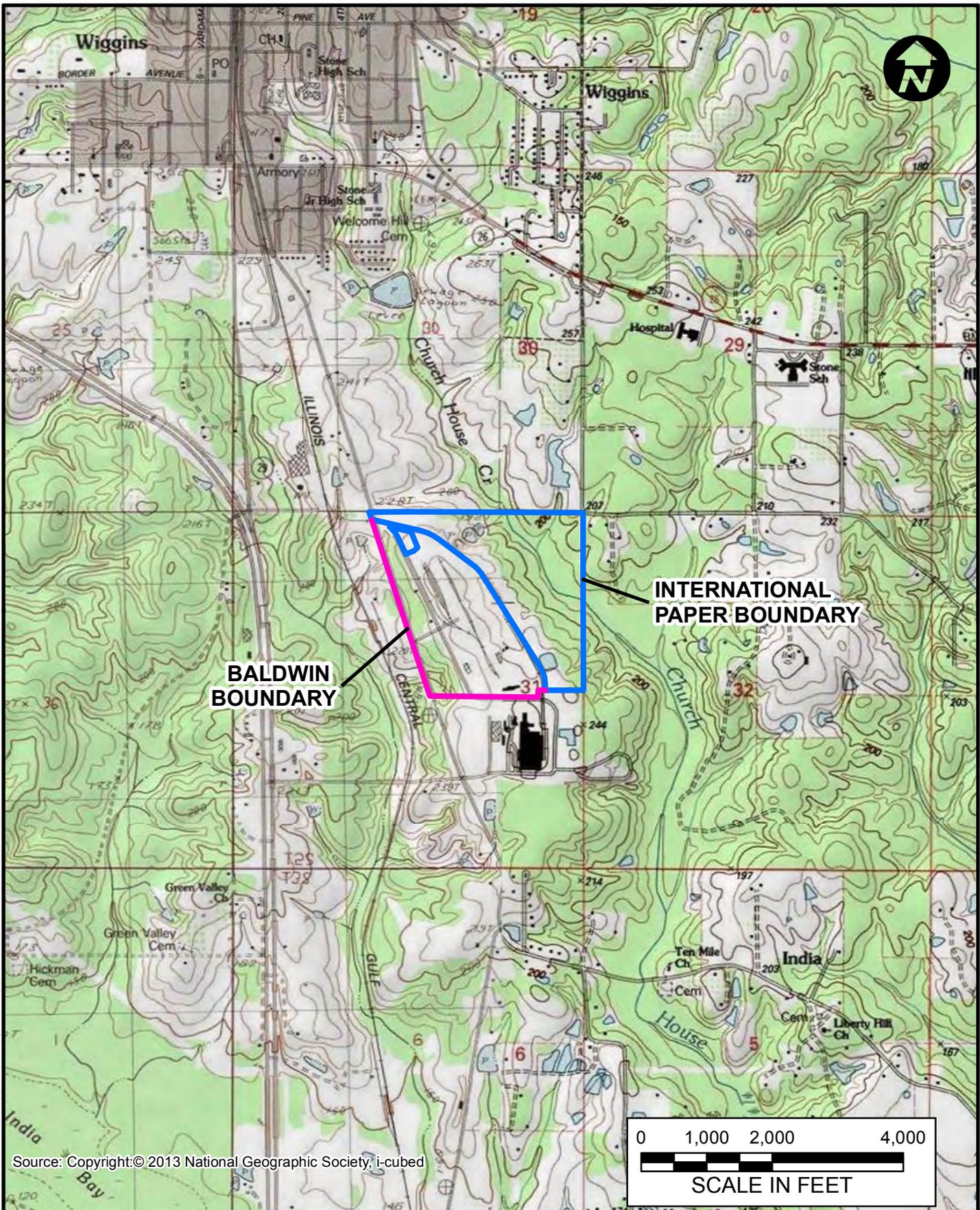
- 1 All depths and elevations are in feet, screen depth is measured below ground surface.
- 2 **TOC** = Top of Casing
- 3 **HET** = Harmon Engineering and Testing Company
- 4 **LAW** = Law Engineering Testing Company
- 5 **JLGA** = James L. Grant and Associates
- 6 **WCC** = Woodward-Clyde Consultants
- 7 Well was abandoned in June 2005.
- 8 Wells were resurveyed in 2006.
- N/A Information not available.

Prepared by: TJM 2/25/19
 Reviewed by: JRM 2/28/19

Table 2. Monitoring Parameters and GWPS

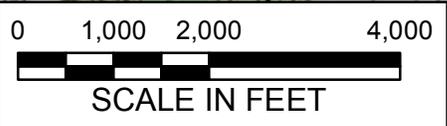
Constituent	GWPS (ug/L)
2,3,4,6-Tetrachlorophenol	1100
2,4,6-Trichlorophenol	3.6
2,4-Dichlorophenol	110
2,4-Dimethylphenol	730
2-Methylnaphthalene	122
2-Methylphenol (o Cresol)	1800
3 and 4-Methylphenol (m and p Cresol)*	180**
Acenaphthene	370
Acenaphthylene	2190
Anthracene	1800
Benzo(b)fluoranthene	0.092
Benzo(k)fluoranthene	0.92
Carbazole	3.4
Chrysene	9.2
Dibenzofuran	12
Fluoranthene	1500
Fluorene*	240
Naphthalene*	6.2
Pentachlorophenol*	1.0
Phenanthrene*	1100
Phenol	11000
Pyrene	180
Ethylbenzene	700
Xylene	10000

FIGURES



**BALDWIN
BOUNDARY**

**INTERNATIONAL
PAPER BOUNDARY**



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File: S:\Premier\Projects\International Paper - SMP\Wiggins\Drawings\GIS\Fig-1 Site Location Map.mxd 3/11/2019 4:53:38 PM hpham

INTERNATIONAL PAPER

FORMER TREATED WOOD PRODUCT FACILITY
WIGGINS, MISSISSIPPI

PROJECT NO. 02.20000006

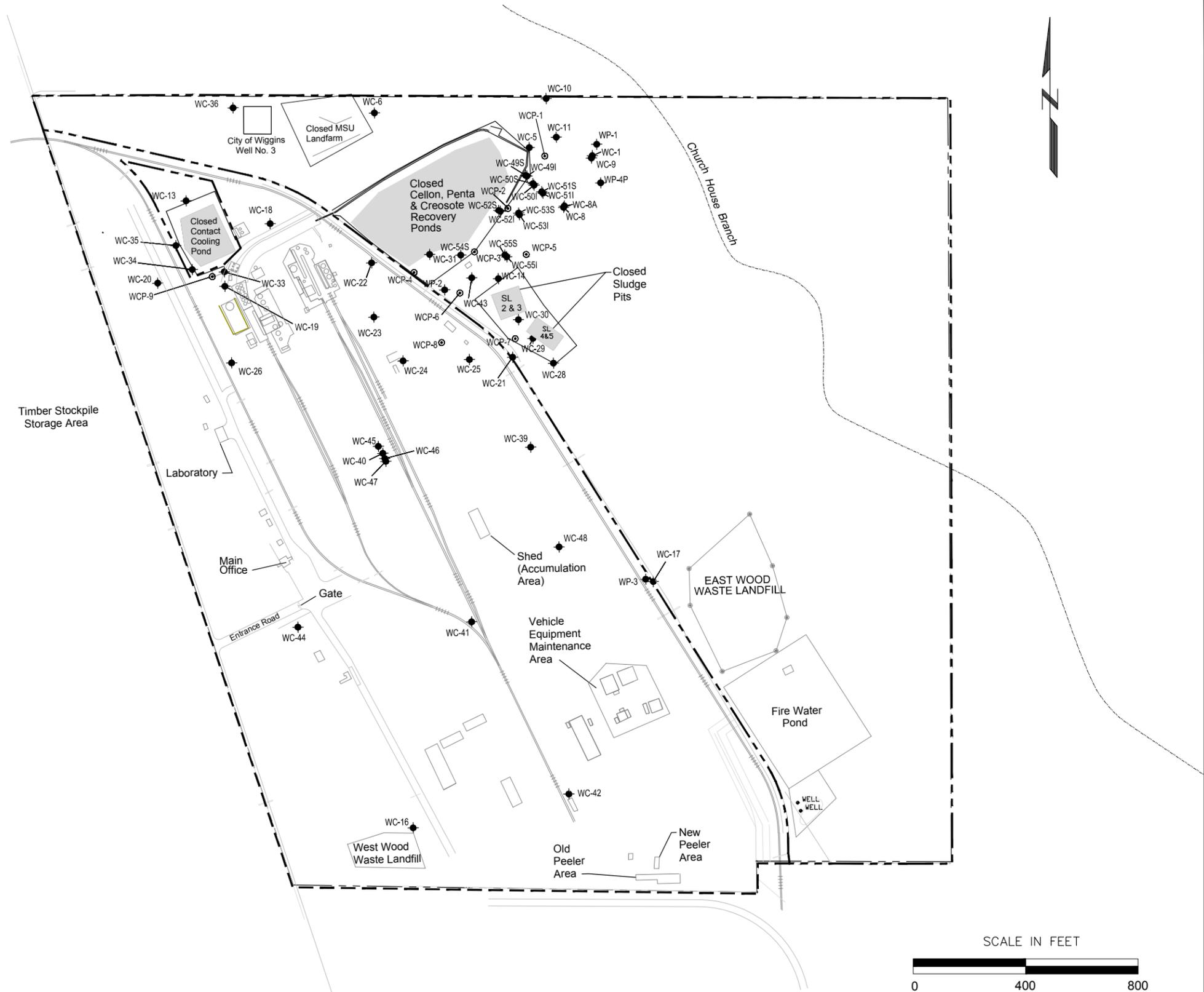
EARTHCON

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1880 West Oak Pkwy, Building 100, Suite 106
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(770)973-2100

SITE LOCATION MAP

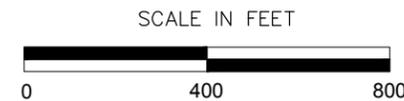
DRAWN HVP	CHECKED DA	DATE MAR 2019	FIGURE 1
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FILENAME: S:\TEMP\PROJECTS\INTERNATIONAL PAPER - SHELBY WIGGINS\WIGGINS\GIS\MAPS\WC_2019.DWG (SITE MAP) USER: JLD/1/19 10:11 AM



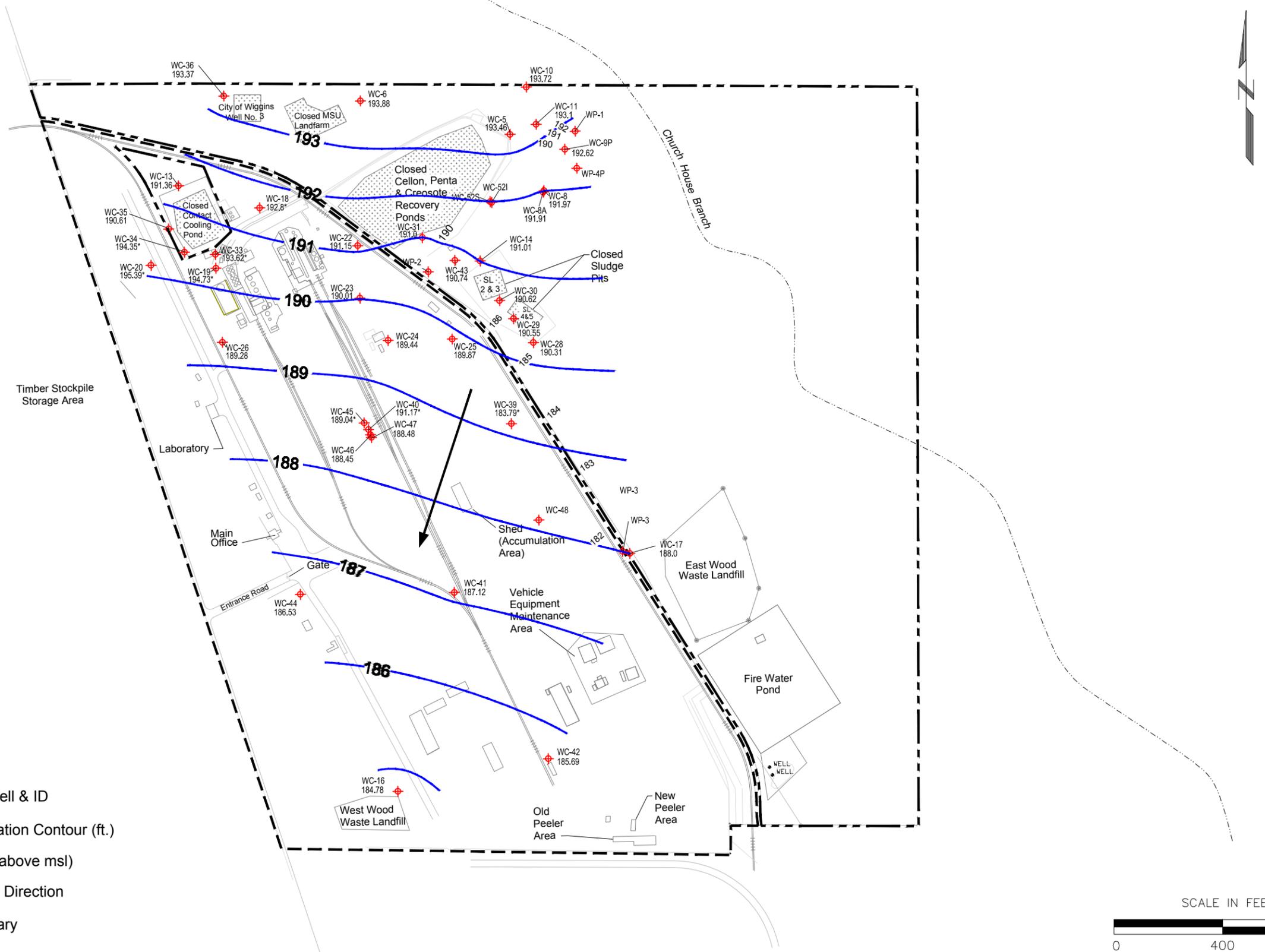
LEGEND

- Groundwater Monitoring Well
- Groundwater Extraction Well
- International Paper Boundary
- Baldwin Pole Boundary
- Railroad tracks
- Fenceline



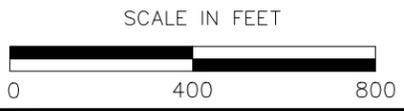
<p>INTERNATIONAL PAPER FORMER TREATED WOOD PRODUCT FACILITY WIGGINS, MISSISSIPPI</p>	 EARTHCON EarthCon Consultants, Inc. 1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062	<p>WIGGINS FACILITY SITE MAP</p>
PROJECT NO. 02.20000006		
DRAWN: HVP	CHECKED: MAB	DATE: FEB 2019
		FIGURE: 2

FILENAME: Nov 2016 S:\Premier\Projects\International Paper - SMP\Wiggins\Drawings\Monitoring Reports\2019 POT.dwg (POTMAP) 01/21/20 19:11 - hphom



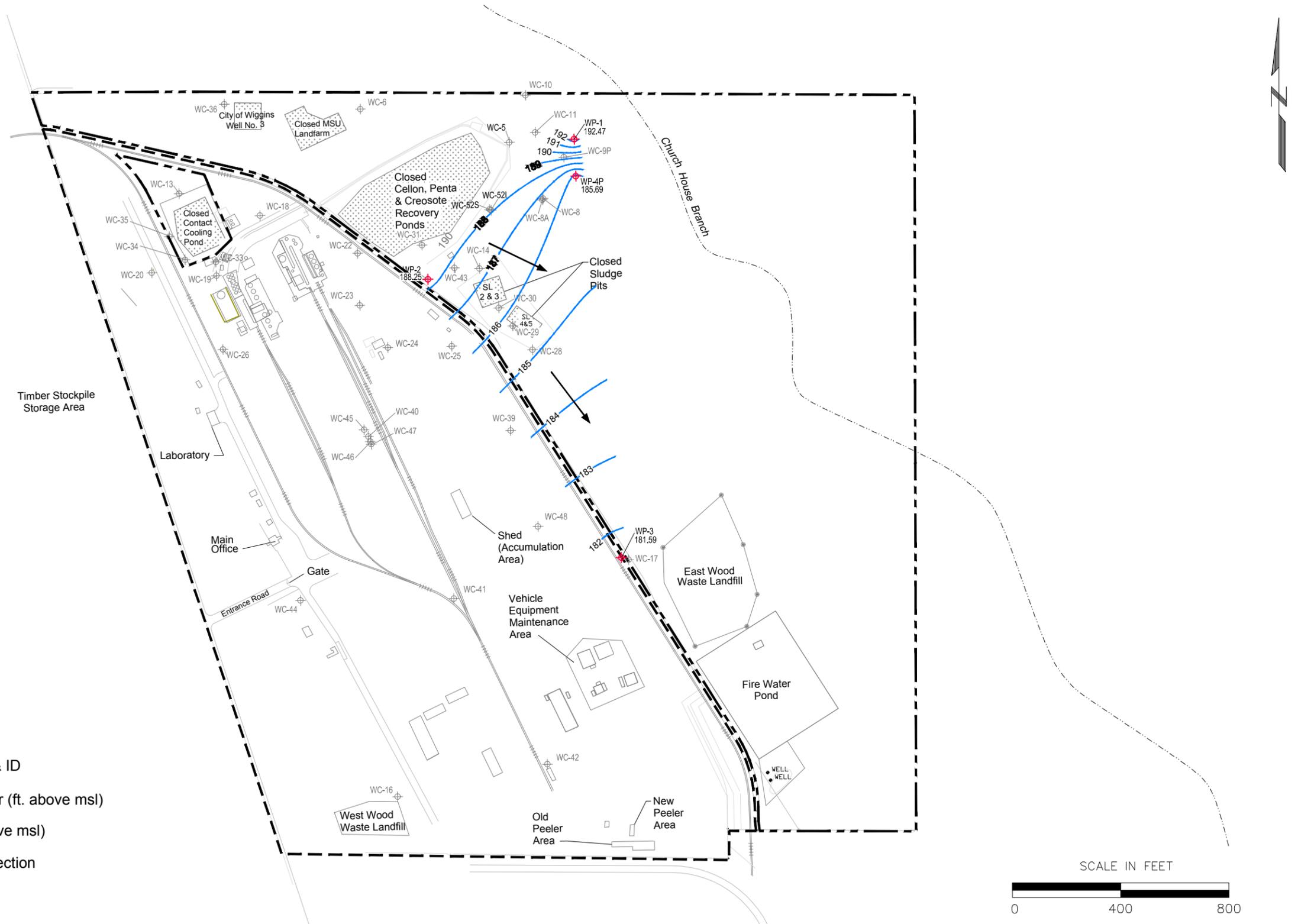
LEGEND

- WC-16 Groundwater Monitoring Well & ID
- 186 Inferred Groundwater Elevation Contour (ft.)
- 184.78 Groundwater Elevation (ft. above msl)
- Inferred Groundwater Flow Direction
- International Paper Boundary
- Baldwin Pole Boundary
- Railroad tracks
- * Data not used in contouring
- NM Not Measured



<p>INTERNATIONAL PAPER</p> <p>FORMER TREATED WOOD PRODUCTS FACILITY WIGGINS, MISSISSIPPI</p> <p>PROJECT NO. 02.2000006.90</p>	<p>EARTHCON</p> <p>EarthCon Consultants, Inc.</p> <p>1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062</p>	<p>CITRONELLE AQUIFER POTENTIOMETRIC SURFACE MAP DECEMBER 9, 2019</p>
DRAWN: HVP	CHECKED: DCA	DATE: DEC 13, 2019
FIGURE: 3		

FILENAME: Nov 2016 S:\Premier\Projects\International Paper - SMP\Wiggins\Drawings\Monitoring Reports\2019 POT PASCAGOULA.dwg (PASCAGOULAQUIFER) 01/09/20 20:57 - hpham



LEGEND

- WP-4P Groundwater Monitoring Well & ID
- 184 Groundwater Elevation Contour (ft. above msl)
- 185.69 Groundwater Elevation (ft. above msl)
- Inferred Groundwater Flow Direction
- International Paper Boundary
- Baldwin Pole Boundary
- Railroad tracks

INTERNATIONAL PAPER
 FORMER TREATED WOOD PRODUCTS FACILITY
 WIGGINS, MISSISSIPPI

PROJECT NO. 02.20000006.90

EARTHCON[®]
 EarthCon Consultants, Inc.

1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

PASCAGOULA AQUIFER
 POTENTIOMETRIC SURFACE MAP
 DECEMBER 9, 2019

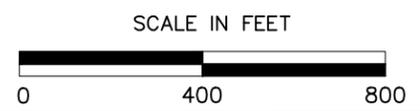
DRAWN: HVP	CHECKED: DCA	DATE: DEC 16, 2019	FIGURE: 4
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FILENAME: Nov 2016 S:\Premier\Projects\International Paper - SMP\Wiggins\Drawings\Monitoring Reports\2019\Proposed Monitoring Well Locations.dwg (PRP_WELLS) 01/25/20 16:14 - hpham



LEGEND

- WC-56 Proposed Groundwater Monitoring Well & ID
- WC-16 Groundwater Monitoring Well & ID
- International Paper Boundary
- Baldwin Pole Boundary
- Railroad tracks



INTERNATIONAL PAPER
FORMER TREATED WOOD PRODUCTS FACILITY
WIGGINS, MISSISSIPPI
PROJECT NO. 02.20000006.90

EARTHCON
EarthCon Consultants, Inc.
1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

PROPOSED MONITORING WELL LOCATIONS MAP

DRAWN: HVP	CHECKED: DCA	DATE: JAN 21, 2020	FIGURE: 5
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(Aerial Source: Google Earth Imagery 03/2019)

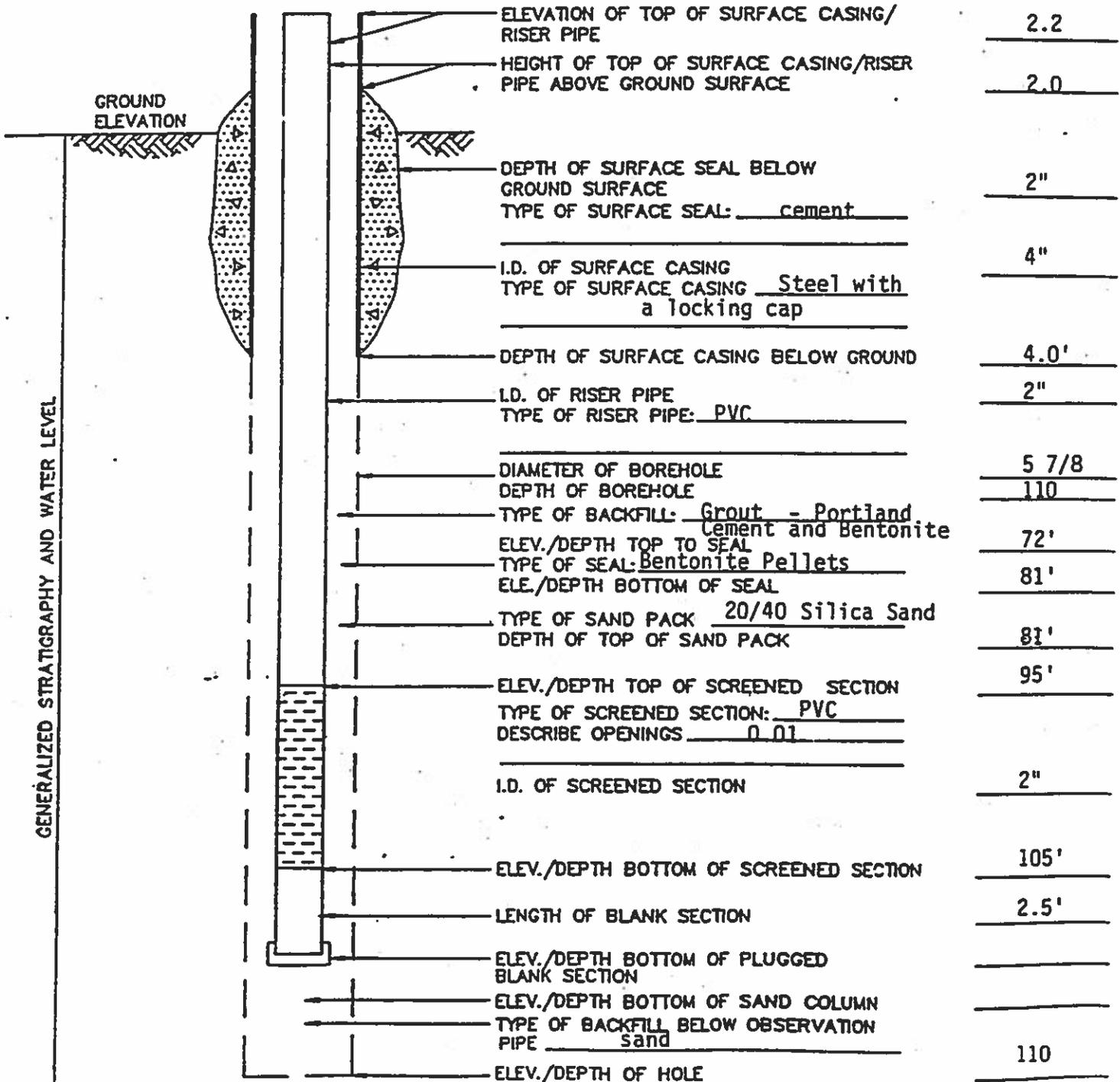
APPENDICES

APPENDIX A
SOIL BORING AND WELL CONSTRUCTION LOGS
FOR SELECT WELLS



MONITOR WELL INSTALLATION REPORT

PROJECT International Paper 91B618C PAGE 1 OF 1
 LOCATION Wiggins, Mississippi WELL NO. WC-40
 DATE COMPLETED 09/12/91 ORIGINAL DEPTH 110 AQUIFER Citronelle
 INSPECTED BY Steve Krul DATE 09/12/91 -zone
 CHECKED BY _____ DATE _____ DEPTH INTERVAL _____



LOG OF BORING

PROJECT: **Modification to Corrective Action Program**
 LOCATION: **International Paper Company
 Wiggins, Mississippi**
 CLIENT: **International Paper Company
 Wiggins, Mississippi**

BORING: **WC-43**
 FILE: **91B618C**
 DATE: **2/24/93**
 TECHNICIAN: **SAK**
 APPROVED: **MEC**
 PAGE: **1 of 3**

Wash Bored: **Full Depth**

DEPTH (FEET)	SAMPLE	S.P.T.(b/f) or P.Pen.(tsf)	OVA (ppm)	Recovery (inch)	Description of Stratum	
0						Dense dark red Silty SANDS, dry (SM)
5				12		
10				24		—with white sand streaks at 10'
15				18		
20				15		
25				19		Firm light reddish pink and yellow Silty SANDS, dry (SM)
30				20		Alternating layers of stiff dark reddish purple laminated CLAYS and reddish pink and tan SANDS (CH/SP)
35				16		Loose red, white and tan SANDS, moist (SP)
40				14		—with red, purple and yellow clay pockets at 35'
45				16		—wet to saturated at 45'
50				20		

Continued Next Page

Unified Soil Classifications based on visual observations.



LOG OF BORING

PROJECT: **Modification to Corrective Action Program**
 LOCATION: **International Paper Company
 Wiggins, Mississippi**
 CLIENT: **International Paper Company
 Wiggins, Mississippi**

BORING: **WC-43**
 FILE: **91B618C**
 DATE: **2/24/93**
 TECHNICIAN: **SAK**
 APPROVED: *MEC*
 PAGE: **2 of 3**

DEPTH (FEET)	SAMPLE	S.P.T. (b/ft) or P.Psu. (tsf)	OVA (ppm)	Recovery (inch)	Description of Stratum					
50					Loose red and white medium to fine grained SANDS (SP)					
55				16	—tan at 55'					
60				22						
65				17	Alternating layers of purple CLAYS with yellow and red streaks and tan and dark red SANDS (CH/SP)					
70				15	Firm brown SANDS, moist, with saturated tan sand and gravel (SP)					
75				24						
80				22						
85				19	—with dark red and purple clay pockets at 85'					
90				9	Loose tan, pink and white SANDS, saturated (SP)					
95	NR									
100				7						

NR = No Recovery

Continued Next Page

Unified Soil Classifications based on visual observations.

LOG OF BORING

PROJECT: **Modification to Corrective Action Program**
 LOCATION: **International Paper Company
 Wiggins, Mississippi**
 CLIENT: **International Paper Company
 Wiggins, Mississippi**

BORING: **WC-43**
 FILE: **91B618C**
 DATE: **2/24/93**
 TECHNICIAN: **SAK**
 APPROVED: *WEC*
 PAGE: **3 of 3**

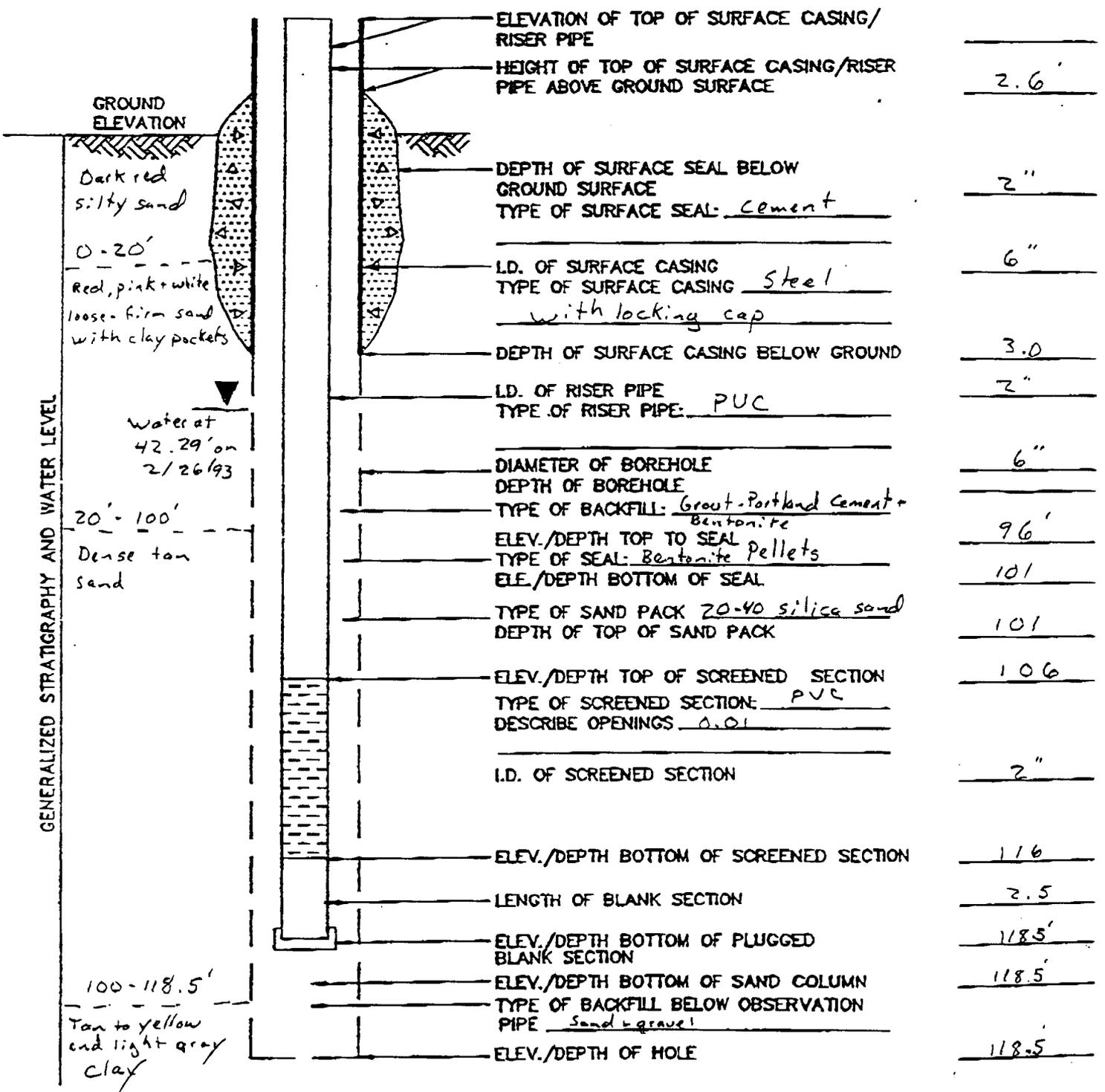
DEPTH (FEET)	SAMPLE	S.P.T. (b/ft) or P.Pen. (tsf)	OVA (ppm)	Recovery (inch)	Description of Stratum	
100						Dense to firm tan SANDS, saturated (SP)
105	NR					
110				4		—dense to very dense pink, red and tan at 110'
115				5		
120				24		Stiff tan, yellow and light gray CLAYS (CH)
						Bottom of boring at 120'. Well WC-43 was set in borehole.

NR = No Recovery

Unified Soil Classifications based on visual observations.

MONITOR WELL INSTALLATION REPORT

PROJECT International Paper Company 91B618C PAGE 1 OF 1
 LOCATION Wiggins, Mississippi WELL NO. WC-43
 DATE COMPLETED 2/25/93 ORIGINAL DEPTH 120 AQUIFER Citronelle
 INSPECTED BY Steve Krul DATE 2/25/93 zone
 CHECKED BY _____ DATE _____ DEPTH INTERVAL _____



State Well Report

Part 1 - Driller's Log

Mississippi Department of Environmental Quality
Office of Land and Water Resources
P.O. Box 10631
Jackson, MS 39289-0631
(601)961-5210
(601)354-6938 (fax)

County: Stone
 Permit #: _____
 Driller: 0578
 Date drilling completed: 6-6-05

For Office Use Only:

Aquifer: _____
 Well #: _____
 L. S. Elevation: _____
 E-log #: _____

State Law requires that this report be prepared by the license holder responsible for the work and filed with the Department at the above address within 30 days of completion of drilling of the well or borehole.

Information on Well Owner <i>(Landowner if borehole is not for a water well)</i>	Well or Borehole Location
Owner Name: <u>International Paper</u>	Latitude: <u>30° 50' 09"</u> Longitude: <u>89° 07' 36"</u>
Mailing Address: _____	Method of Lat/Long (circle one): Conventional Survey, USGS quad , Hand-held GPS, Survey-grade GPS
City: _____ State: _____ Zip Code: _____	<u>NE</u> 1/4 <u>NW</u> 1/4 Sec <u>31</u> Twn <u>25</u> Rng <u>11W</u>
Telephone No. (____) _____	Distance _____ Miles Direction <u>S</u> of Nearest Town <u>Wiggins</u>

Well / Borehole Data

Date drilling started: 6-6-05 Date drilling completed: 6-6-05 Hole depth: 64 Hole diameter: 8.5"

Location of the source of any surface water used for drilling: HSA Drilling Technique

Method of dosing and volume of Chlorine used in drilling and development: NA

Logs run (circle all applicable): No log run Electric Gamma Ray Density Sonic Neutron Other: NA

Name of organization running log(s): NA

Purpose of borehole (check one): Water Well Geotechnical/Geological Investigation Ground Source Heat Pump
 Seismic Survey Other (describe) monitor well

If drilling is not related to water well construction, skip the remainder of this block

Purpose of Well (check one): Home Industrial Public Supply Irrigation Fish Culture Other: monitor

If a flowing well, method of flow regulation: Valve _____ Other (describe) _____

Static Water Level: _____ feet above or below (circle one) land surface Date measured: _____

Method of Measurement (circle one) steel tape electric tape air line other: _____

Well depth: 64 Well grouted to a depth of 40 feet Type of grout (circle one): ~~Neat Cement~~ Bentonite Mix

Casing length: 44 feet Casing diameter: 2 inches Type of casing: PVC

Screen length: 20 feet Screen diameter: 2 inches Type of screen: PVC

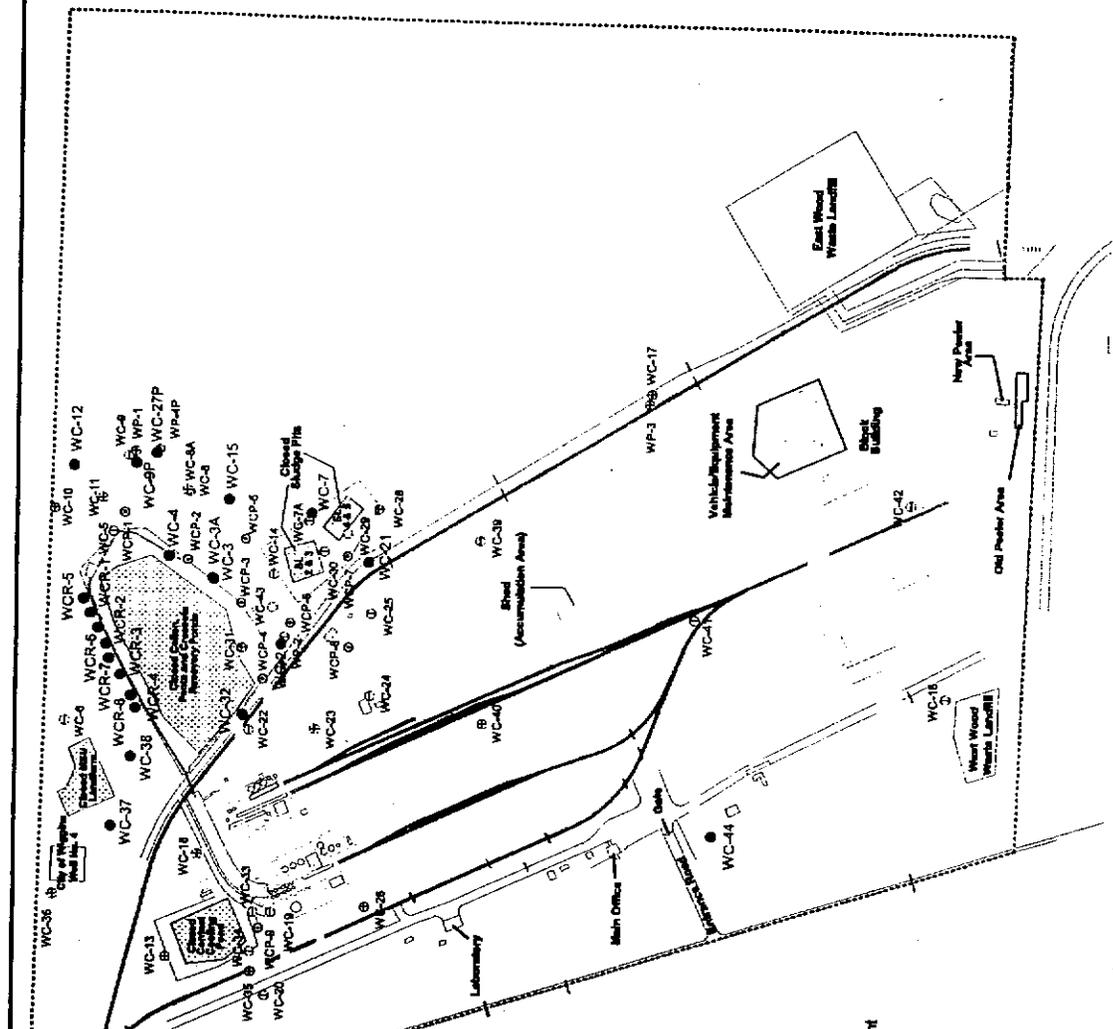
Screen slot size: .010 inches Setting depth: From 44 feet to 64 feet

Type of completion (circle all applicable): Gravel packed Underreamed Telescoped Open hole Natural Development
 Other (describe): 8" Flush mount

Top of lap pipe or reduction in casing: _____ feet. *If telescoped or more than one screen, describe on next page*



WC-44



LEGEND

- Groundwater monitoring well - proposed for installation
- Groundwater monitoring well - proposed for abandonment
- Groundwater injection well - proposed for abandonment
- ⊕ Groundwater monitoring well - existing
- ⊖ Groundwater extraction well - existing
- ⊠ Closed RCRA - regulated units (former SMMUs)
- Railroad Tracts
- Site boundary

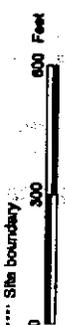


Figure 2. Wiggins facility site map

MONITORING WELL WC-44

Well ID: WC-44

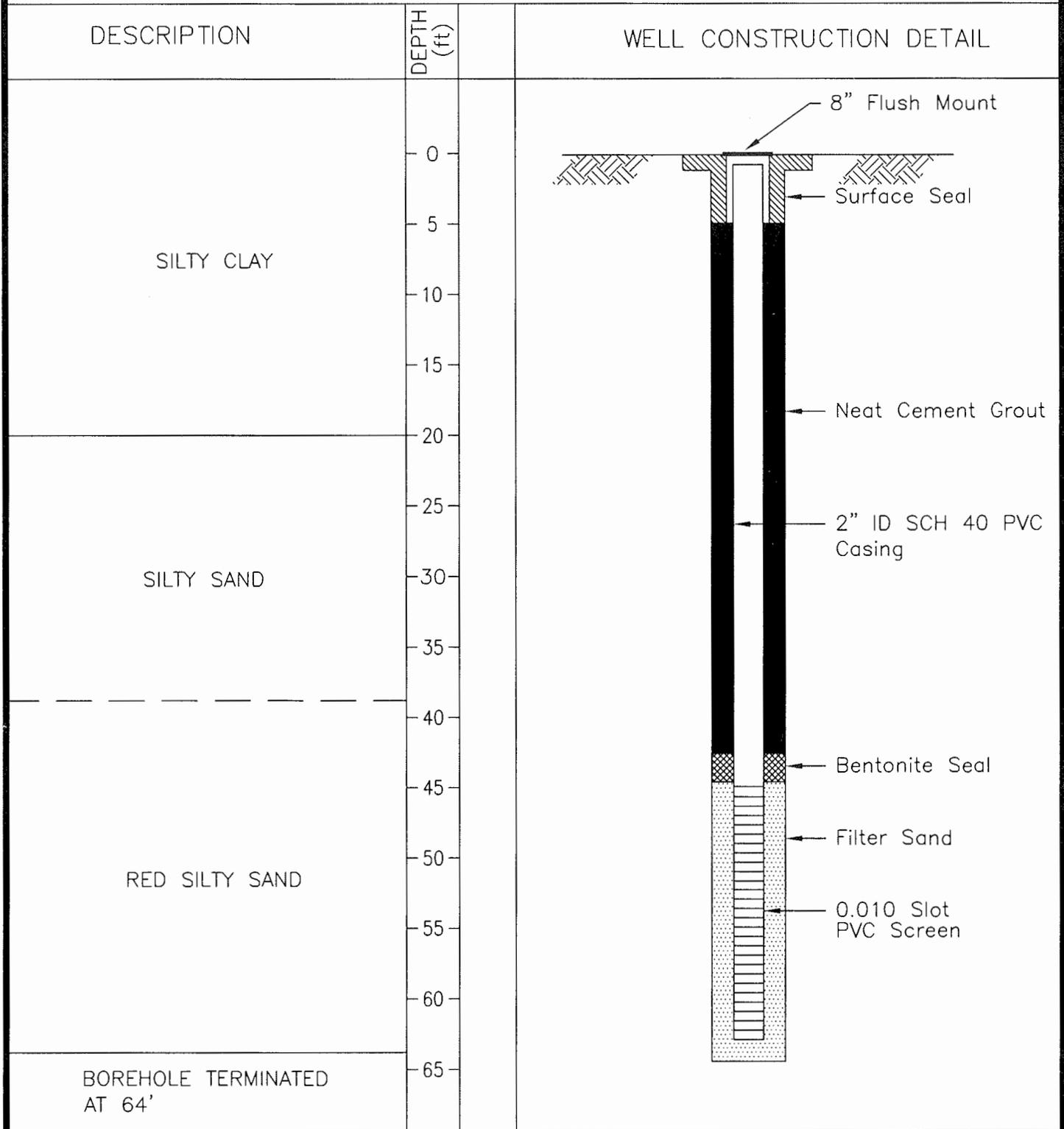
Driller: WALKER-HILL

Logged By: PREMO

Date: 6-6-05

Hole Dia.: 8.5"

Drill Method: HSA



BORING RECORD

Surface Elev. (Feet)	Depth (Feet)	Description	Unified Soil Classif.	Penetration Resistance, "N" Blows per Foot											Sample Data	Remarks		
				10	20	30	40	50	60	70	80	90						
223.24		Soil sampling started at 54.5'. (See Boring WC-8 for 0 to 54.5')																
	54.5	CITRONELLE FORMATION: Firm to dense, white and tan silty fine to medium sand with thin purple silty clay layers	SM													X	NO	
	55.0																X	NO
	60.0																X	NO
	65.0																X	NO
	70.0																X	NO
	75.0																X	NO
	80.0														X	NO		
	84.0														X	NO		
	85.0	Very dense yellow silty medium sand													X	NO		
	90														X	NO		

Date Drilled <u>8/8/84</u>	Standard Penetration Test	SO Strong contaminant odor
Drilling Method <u>Rotary</u>	Undisturbed Sample	WO Weak to moderate contaminant odor
Drilled By <u>POPE</u>	Water Table (24 Hour)	NO No contaminant odor
Logged By <u>M. Jewett</u>	Water Table (Time of Boring)	
Checked By <u>S.L.W.</u>	Laboratory Test Location	



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 ENGLEWOOD, COLORADO

Boring Number WC-8A
 Job Number 804024
 Page 1 of 2

BORING RECORD

Elev. (Feet)	Depth (Feet)	Description	Unified Soil Classif.	Penetration Resistance, "N" Blows per Foot											Sample Data	Remarks		
				10	20	30	40	50	60	70	80	90						
	90.0	(See 84.0' to 90.0')	SM													X		
	95.0																X	NO
	100.0																X	NO
	105.0	Same																
	108.6	PASCAGOULA FORMATION: Very hard yellow and grey silty clay	CH															
	110.0																X	NO
	110.5	Boring terminated @ 110.5'																
	115.0																	

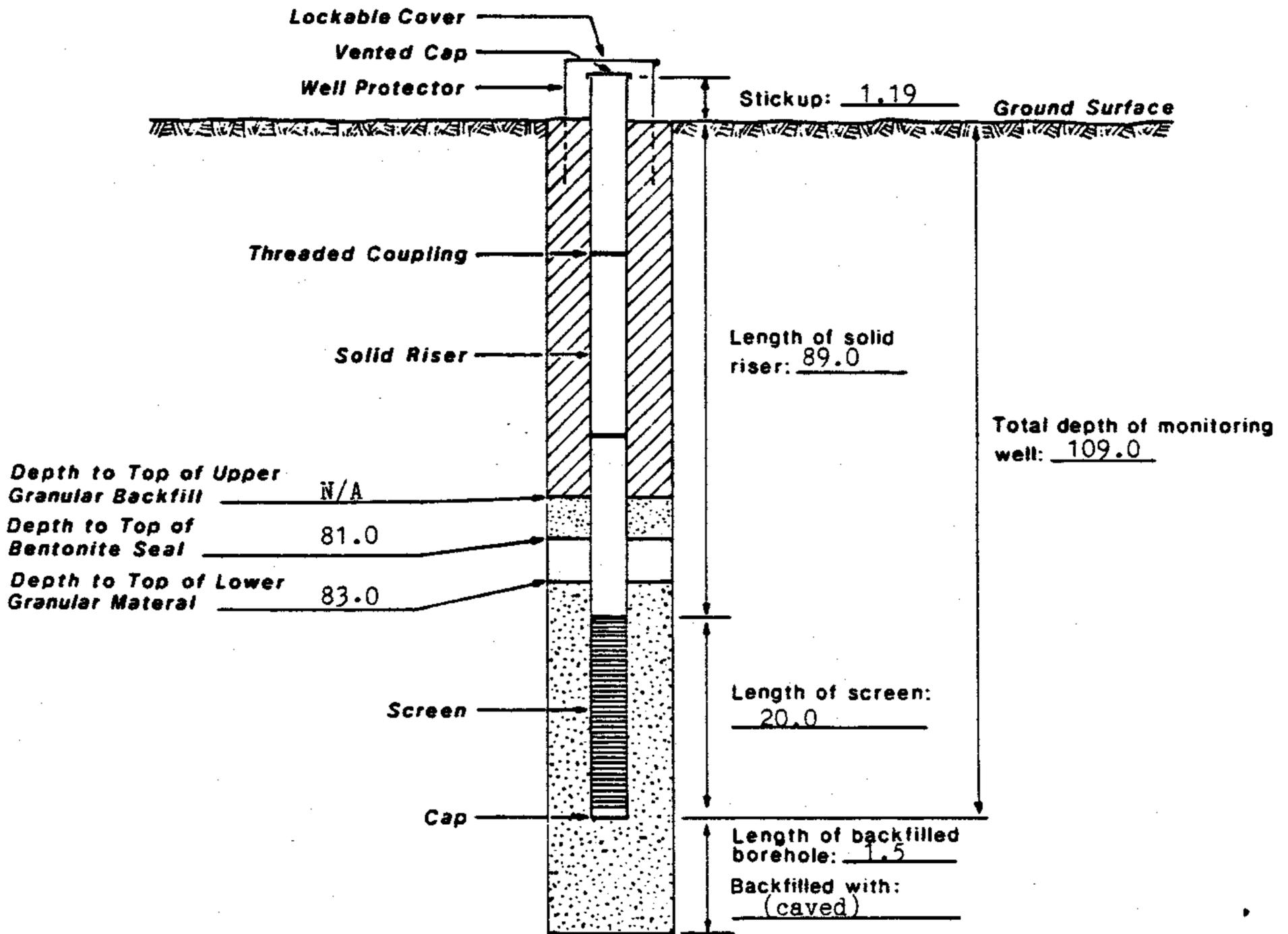
Date Drilled 8/8/84 Standard Penetration Test SO Strong contaminant odor
 Drilling Method Rotary Undisturbed Sample WO Weak to moderate contaminant odor
 Drilled By POPE Water Table (24Hour)
 Logged By M. Jewett Water Table (Time of Boring) NO No contaminant odor
 Checked By S.L.W. L Laboratory Test Location

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Boring Number WC-8A
 Job Number 804024
 Page 2 of 2

MONITORING WELL INSTALLATION RECORD

Job Name IP WIGGINS TWP Well Number WC-8A
 Job Number 804024 Installation Date 8/8/84 Location Wiggins, MS
 Datum Elevation 224.43 Ground Surface Elevation 223.24
 Datum for Water Level Measurement Black mark on top of PVC casing
 Screen Diameter & Material 2" i.d. SCH 40 PVC Slot Size 0.005"
 Riser Diameter & Material 2" i.d. SCH 40 PVC Borehole Diameter 6 3/4"
 Granular Backfill Material Fine gravel JLGA Representative M. Jewett
 Drilling Method Rotary wash Drilling Contractor POPE



- : Grout
- : Bentonite
- : Granular Backfill

(Not to Scale)

Stabilized water level 31.92 feet below datum.

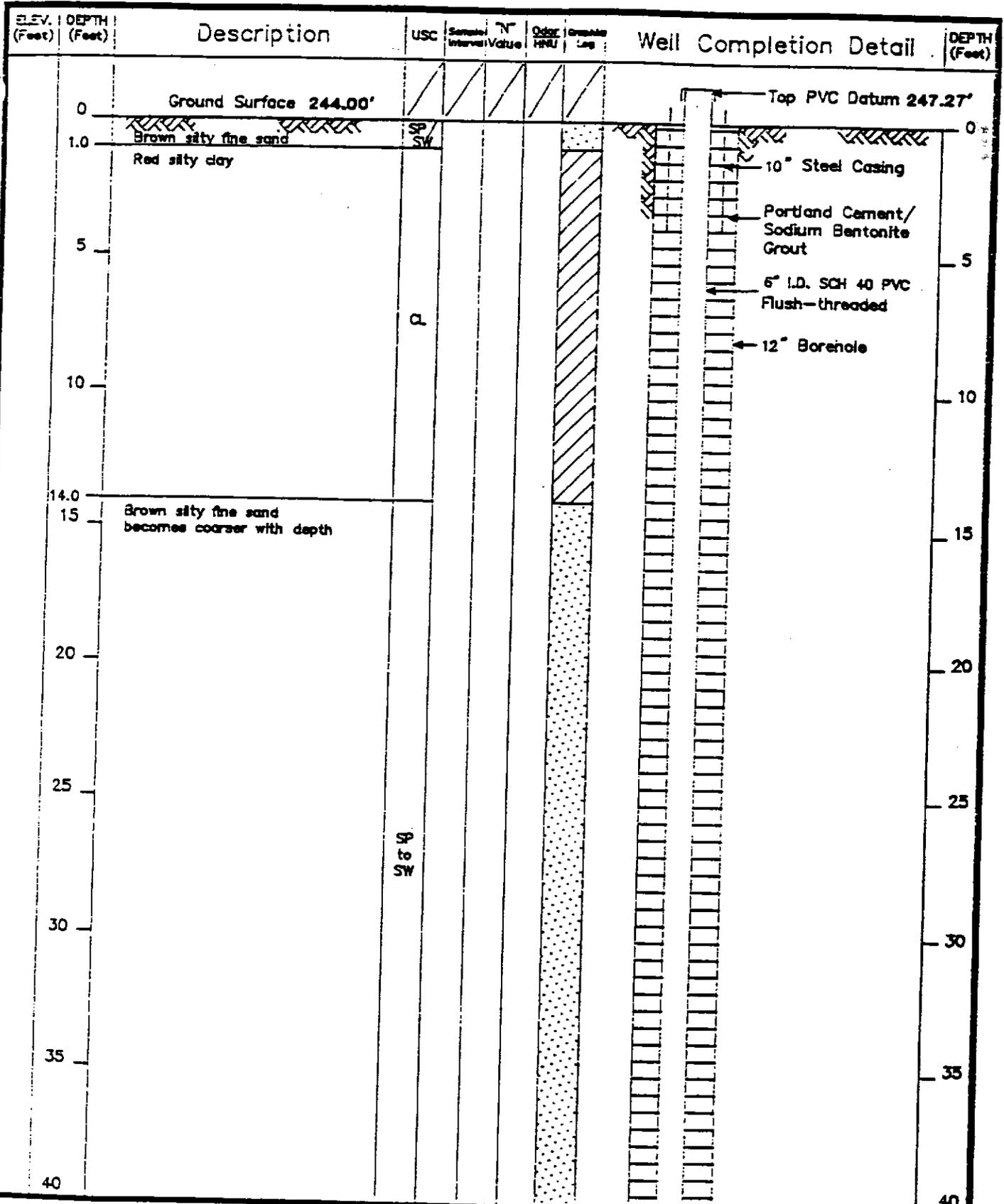
Measured on 8/31/84



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WELL WC-8A

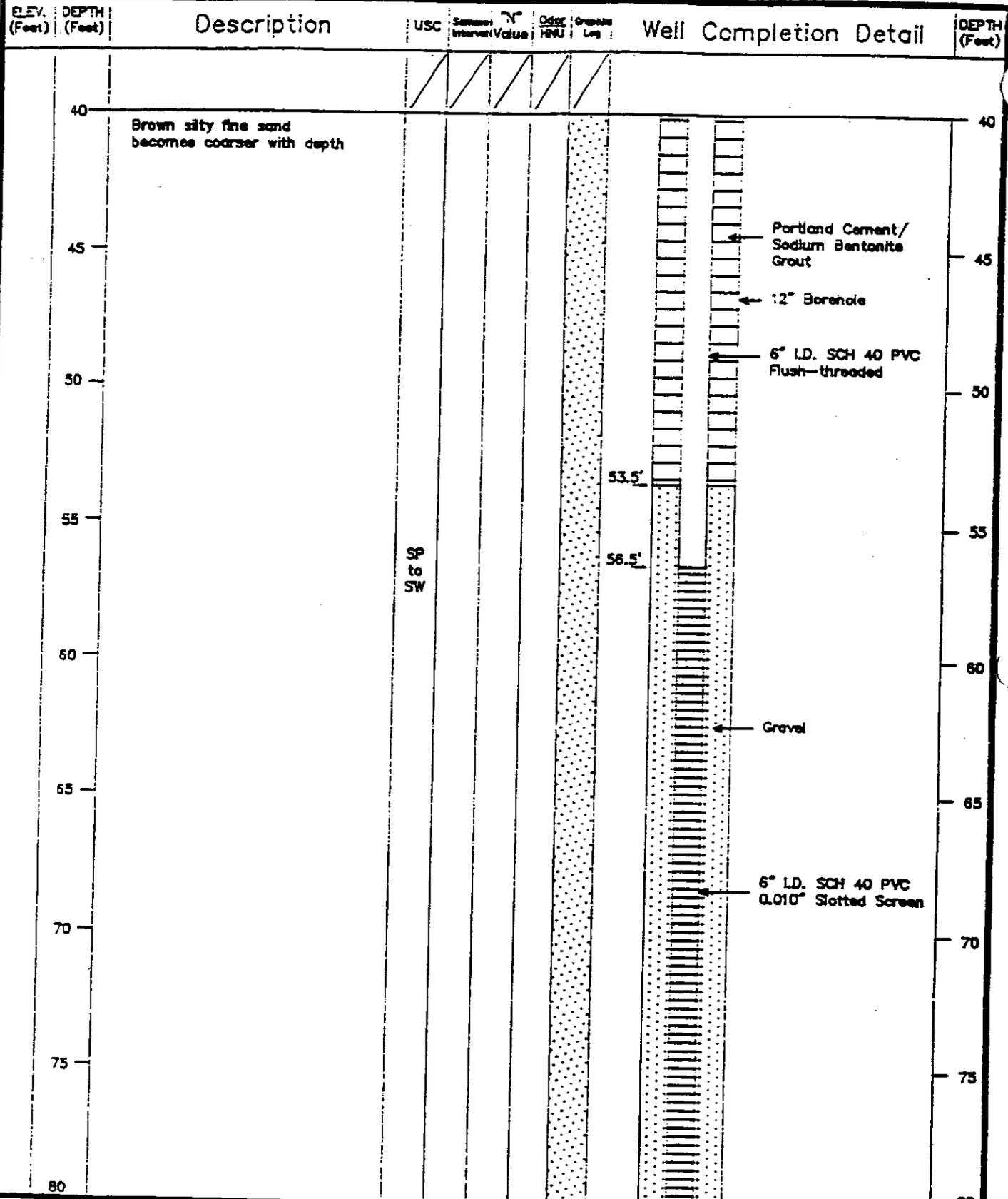
MONITORING WELL
INSTALLATION RECORD



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 DENVER, COLORADO

Monitoring Well Record WCP-8

Location IP TWP FACILITY - WIGGINS, MS
 Coordinates 9091.19 N 51487.83 E
 Drilled By Cole's Clearwater Drilling Method Rotary wash
 Logged By CMJ Checked By SLW
 Installation Date November 8, 1988



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 computer science
 DENVER, COLORADO

Monitoring Well Record WCP-8
 Location IP TWP FACILITY - MIGGINS, MS
 Coordinates
 Drilled By Cole's Clearwater Drilling Method Rotary wash
 Logged By CMJ Checked By SLW
 Installation Date November 8, 1988

TEST BORING RECORD

ELEV. (ft msl)	DEPTH FEET	DESCRIPTION	UNIFIED	PENETRATION RESISTANCE, "N" BLOWS PER FOOT							SAMPLE TYPE OR CORE DATA	REMARKS	
				0	10	20	30	40	50	60			80
205.79	0	Topsoil: Grey silty fine SAND	SM										grab sample NO
	2.5	Citronelle Formation: firm to very firm reddish-brown or yellow silty fine to medium SAND.	SM									<input checked="" type="checkbox"/>	NO
	5											<input checked="" type="checkbox"/>	NO
	10											<input checked="" type="checkbox"/>	NO
	15											<input checked="" type="checkbox"/>	NO
	17.5												16.0'
	20	Loose to very firm tan slightly silty fine to medium SAND.	SP									<input checked="" type="checkbox"/>	NO
	25											<input checked="" type="checkbox"/>	NO
	30											<input checked="" type="checkbox"/>	NO
	32.5	Firm tan slightly clayey gravelly silty fine to medium SAND.	SM									<input checked="" type="checkbox"/>	NO
	35											<input checked="" type="checkbox"/>	NO
	37.5	Very loose to loose tan to white slightly silty fine to medium SAND with occasional silt or clay seams	SP									<input checked="" type="checkbox"/>	NO
	40											<input checked="" type="checkbox"/>	NO

DATE DRILLED 5/10-11/83
 DRILLING METHOD rotary wash
 DRILLED BY H. Carnley
 LOGGED BY WWE
 CHECKED BY SLW

- STANDARD PENETRATION TEST
- WATER TABLE 24 HR
- WATER TABLE TIME OF BORING
- UNDISTURBED SAMPLE
- L LABORATORY TEST LOCATION

BORING NUMBER WT-1
 JOB NUMBER 812073

- SO STRONG CONTAMINANT ODOR
- WO WEAK TO MODERATE CONTAMINANT ODOR
- NO NO CONTAMINANT ODOR

TEST BORING RECORD

ELEV. (ft msl)	DEPTH FEET	DESCRIPTION	UNIFIED	PENETRATION RESISTANCE, "N" BLOWS PER FOOT							SAMPLE TYPE OR CORE DATA	REMARKS	
				0	10	20	30	40	50	60			80
	40	Same as 37.5' to 40.0'											
	45	White, silty clay layer @ 44.9' to 45.3'	SP										
	47.5												
	50	Very loose to very dense white to tan silty fine to medium SAND with occasional thin red clayey silt layers and occasional gravel.	SM								L		
	55												
	60												
	65										L		
	67.5	Very dense tan slightly silty fine to medium SAND with occasional trace gravel and red clayey silt layers.	SP										
	70												
	75												
	80												

DATE DRILLED 5/10-11/83
 DRILLING METHOD rotary wash
 DRILLED BY H. Carnley
 LOGGED BY WWB
 CHECKED BY SLW

- STANDARD PENETRATION TEST
- WATER TABLE 24 HR
- WATER TABLE TIME OF BORING
- UNDISTURBED SAMPLE
- LABORATORY TEST LOCATION

BORING NUMBER WP-1
 JOB NUMBER 612073
 PAGE 2 of 4

- SO STRONG CONTAMINANT ODOR
- WO WEAK TO MODERATE CONTAMINANT ODOR
- NO NO CONTAMINANT ODOR

TEST BORING RECORD

ELEV. (ft msl)	DEPTH FEET	DESCRIPTION	UNIFIED	PENETRATION RESISTANCE, "N" BLOWS PER FOOT							SAMPLE TYPE OR CORE DATA	REMARKS
				0	10	20	30	40	60	80		
	80	Same as 67.5' to 80.0'	SP									
	82.5											
	85	Very dense tan silty fine to medium SAND.	SM								50/6	NO
	87.5											
	90	Very dense tan slightly silty fine to medium sand	SP								L	NO
	94.0											
	95	Pascaqoula Formation (?): very stiff to very hard gray slightly sandy clayey SILT, some iron mottling.										no recovery, but traces of clayey silt on spoon.
		Well rounded quartz and chert gravel @ 95.5' to 96.2'									50/6	NO
	100	Reddish-brown clayey sandy silt layer @ 99.0'	CL								L	NO
	105											NO
	107.5											
	110	Hard tan to gray fine sandy clayey SILT, some iron mottling.	ML									NO
	115											NO
	117.5	Very firm to dense light gray to reddish-brown clayey silty fine SAND; occasional reddish-brown sandy silt laminations	SM									NO
	120											

DATE DRILLED 5/10-11/83
 DRILLING METHOD rotary wash
 DRILLED BY H. Carnley
 LOGGED BY WWE
 CHECKED BY SLW

 STANDARD PENETRATION TEST
 WATER TABLE 24 HR
 WATER TABLE TIME OF BORING
 UNDISTURBED SAMPLE
 LABORATORY TEST LOCATION

BORING NUMBER WF-1
 JOB NUMBER 812073
 PAGE 3 of 3

SO STRONG CONTAMINANT ODOR
 WO WEAK TO MODERATE CONTAMINANT ODOR
 NO NO CONTAMINANT ODOR

TEST BORING RECORD

ELEV. (ft msl)	DEPTH FEET	DESCRIPTION	UNIFIED	PENETRATION RESISTANCE, "N" BLOWS PER FOOT							SAMPLE TYPE OR CORE DATA	REMARKS			
				0	10	20	30	40	60	80					
	120	Same as 117.5' to 120.0'	SM												
	125												X	NO	
	130												X	NO	
	135			Reddish-brown silty fine to medium sand layer @ 134.0'.											NO
	140													L	NO
	142.5	Very firm light gray clayey silty fine to medium SAND.										X	NO		
140.29	145	Boring Terminated @ 145.5'										X	NO		
	145.5														

DATE DRILLED 5/10-11/83
 DRILLING METHOD rotary wash
 FILLED BY H. Carnley
 LOGGED BY WWE
 CHECKED BY SLW

- STANDARD PENETRATION TEST
- WATER TABLE 24 HR
- WATER TABLE TIME OF BORING
- UNDISTURBED SAMPLE
- LABORATORY TEST LOCATION

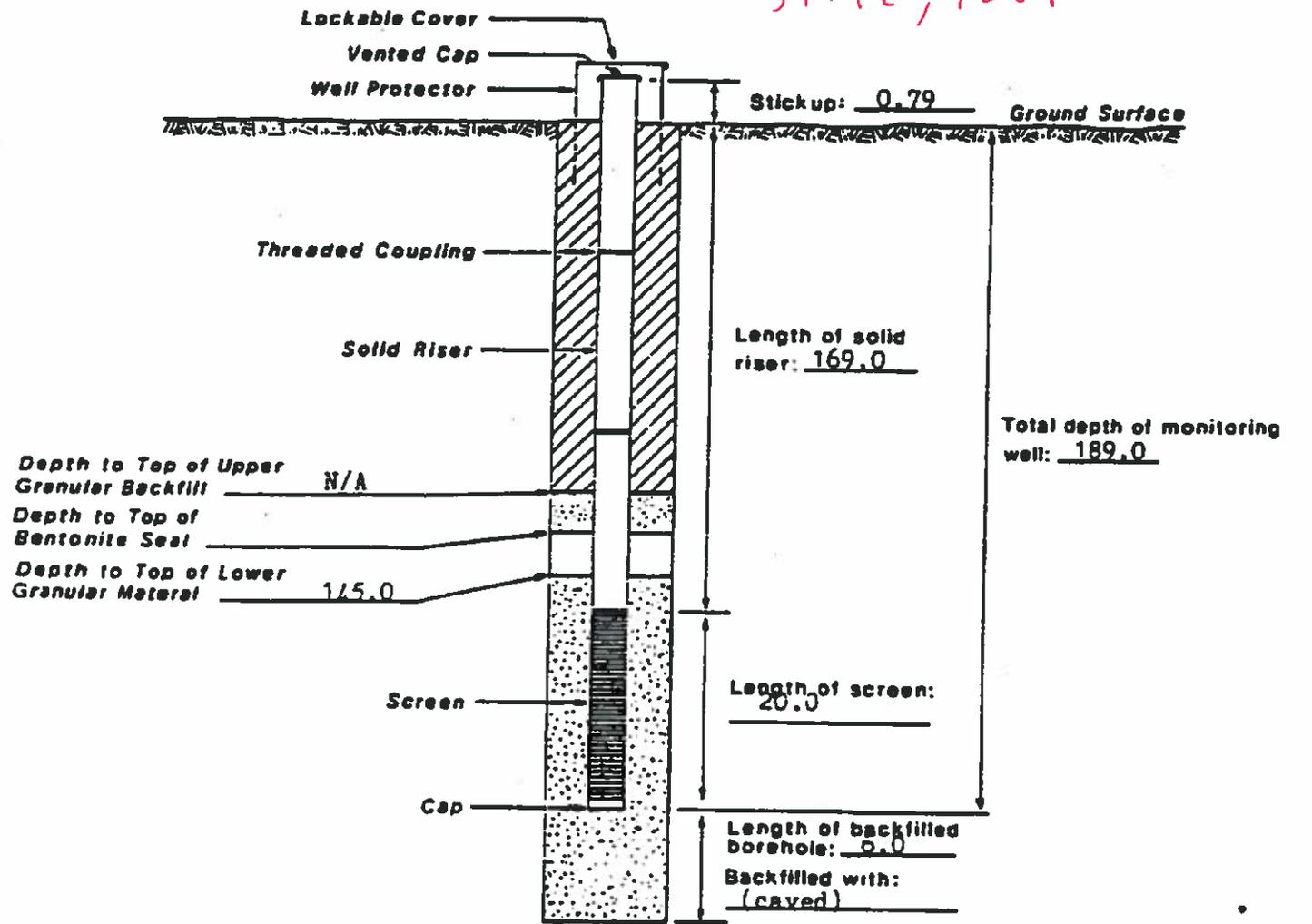
BORING NUMBER WF-1
 JOB NUMBER 812073
 PAGE 4 of 4

- SO STRONG CONTAMINANT ODOR
- WO WEAK TO MODERATE CONTAMINANT ODOR
- NO NO CONTAMINANT ODOR

MONITORING WELL INSTALLATION RECORD

Job Name TP WIGGINS TWP Well Number WP-2
 Job Number 80/024 Installation Date 8/15/84 Location Wiggins, MS
 Datum Elevation 239.39 Ground Surface Elevation 238.60
 Datum for Water Level Measurement Top of PVC casing
 Screen Diameter & Material 2" i.d. SCH 40 PVC Slot Size 0.005"
 Riser Diameter & Material 2" i.d. SCH 40 PVC Borehole Diameter 4 3/4"
 Granular Backfill Material Fine gravel JLGA Representative M. Jewett
 Drilling Method Rotary wash Drilling Contractor POPE

51492, 9289



- Grout
- Bentonite
- Granular Backfill

(Not to Scale)

Stabilized water level 50.61 feet below datum.
 Measured on 8/31/84

Surface Elev. (Feet)	Depth (Feet)	Description	Unified Soil Classif.	Penetration Resistance, "N" Blows per Foot											Sample Data	Remarks	
				10	20	30	40	50	60	70	80	90					
138.00		No samples taken from 0 to 119.0'. See log of WC-2 for interval between 0 and 69.5.															
	119.0	CITRONELLE FORMATION: Very dense red and pink fine to medium silty sand	SM													X	NO
	120.0																
	123.0	Hard yellow and grey silty clay with trace of very fine sand	CH														
	125.0																X
	130.0																
	132.5																
	135.0	Very stiff to hard blue-grey silty clay															NO
	140.0																
	145.0															X	NO
	150.0																
	155.0															X	NO

Date Drilled 8/15/94
 Drilling Method Rotary
 Drilled By POPE
 Logged By M. Jewett
 Checked By S.J.W.

 Standard Penetration Test
 Undisturbed Sample
 Water Table (24 Hour)
 Water Table (Time of Boring)
 Laboratory Test Location

SO Strong contaminant odor
 WO Weak to moderate contaminant odor
 NO No contaminant odor



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BORING RECORD

Elev. (Feet)	Depth (Feet)	Description	Unified Soil Classif.	Penetration Resistance, "N" Blows per Foot											Sample Data	Remarks	
				10	20	30	40	50	60	70	80	90					
	155.0	See 132.5 to 155.0	CH													X	NO
	160.0																
	165.0															X	NO
	170.0																
	171.0																
	175.0	Very hard blue-grey fine sandy silt and thin organic streaks below 185.0'	ML													X	NO
	180.0																
	185.0															X	NO
	187.5																
	190.0	Very hard blue-grey silty clay															
	195.0		Boring terminated @ 195.0'														X

Date Drilled 8/15/84
 Drilling Method Rotary
 Drilled By POPE
 geo By M. Jewett
 Checked By S.J.W.

- Standard Penetration Test
- Undisturbed Sample
- Water Table (24 Hour)
- Water Table (Time of Boring)
- Laboratory Test Location

- SO Strong contaminant odor
- WO Weak to moderate contaminant odor
- NO No contaminant odor



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APPENDIX B
PHOTOGRAPHS

Data Gap Investigation Work Plan
International Paper Company – Closed Former Wood Treating Site Units



Photograph of one of three monitoring wells observed inside the closed units on December 10, 2019.

APPENDIX C
FIELDWORK DOCUMENTATION FORMS

